

May 5, 2014

ML 154801

By Electronic Filing

Mr. David J. Collins
Maryland Public Service Commission
William Donald Schaefer Tower
6 Saint Paul Street, 16th Floor
Baltimore, MD 21202-6806

Re: *Proposed Discount Rates for Baltimore Gas and Electric Company's Natural Gas Purchase of Receivables Program*
ML 153032

Proposed Discount Rates for Baltimore Gas and Electric Company's Electricity Purchase of Receivables Program
ML 153033

Proposed Discount Rates for Potomac Electric Power Company's Purchase of Receivables Program
ML 153026

Proposed Discount Rates for Delmarva Power and Light Company's Purchase of Receivables Program
ML 153027

Proposed Discount Rates for The Potomac Edison Company's Purchase of Receivables Program
ML 153037

Dear Mr. Collins:

The Retail Energy Supply Association ("RESA"),¹ by counsel, submits this letter in response to the filings by Baltimore Gas and Electric Company ("BGE"), Potomac Electric Power Company ("Pepco"), Delmarva Power and Light Company ("Delmarva Power"), and The Potomac Edison Company ("PE") to update their respective purchase of receivables ("POR") discount rates effective June 1, 2014. RESA does not oppose the discount rates proposed by the utilities in the above referenced matters.

¹ RESA's members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison Solutions; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Interstate Gas Supply, Inc. dba IGS Energy; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG Energy, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA

RESA maintains its position that late payment revenues ("LPRs") should be included in the discount rate for each utility. On that note, Pepco has consistently maintained that it does not have the capability to include LPRs in its discount rate in Maryland. The D.C. Public Service Commission recently directed Pepco to begin, by January 1, 2015, factoring LPRs into its discount rates for its D.C. POR program.² In light of that order, RESA requests that the Commission issue a similar directive for Pepco's POR program in Maryland.

Please feel free to contact me should you have any questions.

Sincerely,



Brian R. Greene

C: Annette B. Garofalo
Phil Vanderheyden
Kimberly A. Curry
Douglas E. Micheel
Jeffrey P. Trout

² Order No. 17468, In the Matter of the Investigation of a Purchase of Receivables Program in the District of Columbia, District of Columbia Public Service Commission, Formal Case No. 1085 (Apr. 29, 2014).